

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

ROBYN KRAVITZ, *et al.*,

Plaintiffs,

v.

U.S. DEPARTMENT OF COMMERCE, *et al.*,

Defendants.

Civil Action No. 8:18-cv-01041-GJH

Hon. George J. Hazel

LA UNIÓN DEL PUEBLO ENTERO, *et al.*,

Plaintiffs,

v.

WILBUR L. ROSS, sued in his official
capacity as U.S. Secretary of Commerce, *et al.*,

Defendants.

Civil Action No. 8:18-cv-01570-GJH

Hon. George J. Hazel

**PLAINTIFFS' EMERGENCY MOTION
FOR PRELIMINARY INJUNCTION AND INJUNCTION PENDING APPEAL**

Plaintiffs hereby move for a preliminary injunction and injunction pending appeal to prevent Defendants from adding a citizenship question to the 2020 Census forms while this Court and the Fourth Circuit are still reviewing Plaintiffs' Equal Protection and 42 U.S.C. § 1985 claims. For the reasons described in the accompanying Memorandum of Law, Plaintiffs have established that (1) they are likely to succeed on the merits of their Equal Protection and § 1985 claims based on the evidence in the trial record and the newly-discovered evidence submitted with Plaintiffs' Rule 60(b) motion; (2) will be irreparably harmed absent an injunction because Defendants have expressed an intent to print Census forms with a citizenship question while the

courts are still considering those claims; (3) an injunction would not harm Defendants, because they can finalize the Census form until October 31 and because the Census Bureau can produce citizenship data without a citizenship question; and (4) the public interest would not be served by allowing Defendants to proceed with adding a constitutionally suspect question to the census form in an effort to moot and thereby prevent a full and fair adjudication of Plaintiffs' claims.

Dated: June 26, 2019

Respectfully Submitted,

/s/ Daniel Grant (Bar. No. 19659)

/s/ Denise Hulett

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CERTIFICATE OF SERVICE

I certify that on this 26th day of June 2019, I caused a copy of the foregoing document and all accompanying filings to be sent to all parties receiving CM/ECF notices in this case.

By: /s/ Daniel Grant
Daniel T. Grant